

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-2(c)
Eric J Clayman, Esq
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Attorney for Debtor
In Re:
Ameer and Sabrina Lowe, Debtors

Case No.: 14-31654

Judge: JNP

Chapter: 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO

CREDITOR'S MOTION or CERTIFICATION OF DEFAULT

TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT

The debtor in the above-captioned Chapter 13 proceeding hereby objects to the following (**choose one**):

1. Motion for Relief from the Automatic Stay filed by

_____, creditor.

A hearing has been scheduled for _____

OR

- Motion to Dismiss filed by the Standing Chapter 13 Trustee, Isabel C.

Balboa

A hearing has been scheduled for 7/20/2018 at 10:00 AM

- Certification of Default filed by _____, creditor

I am requesting a hearing be scheduled in this matter.

OR

- Certification of Default filed by Standing Chapter 13 Trustee.

I am requesting a hearing be scheduled in this matter.

2. I am objecting to the above for the following reasons (**choose one**):

- Payments have been made in the amount of \$ _____, but have not been accounted for. Documentation in support of attached hereto.
- Payments have not been made for the following reasons and debtor proposes repayment as follows **explain your answer**):
- Other (**explain your answer**): The trustee has filed a motion to dismiss based upon a claim filed by the New Jersey Division of Taxation. The claim relates to my husband's income tax returns for 2010 and 2012 and my income tax return from 2013. The claim is inconsistent with regards to my husband's 2010 return, as it shows up both on the general unsecured and priority. Regardless, the total amount of the claim is \$626.08, and I would just assume have the trustee pay this amount so that we can obtain a discharge as the legal fees and costs and the accounting fees and costs of trying to prepare these returns far exceed the alleged balance due. We ask that the trustee's motion be denied and that we be allowed the opportunity to pay off our bankruptcy plan, including the priority obligation owed to the State of New Jersey Division of Taxation.

3. This Certification is being made in an effort to resolve the issues raised by the creditor in this motion.
4. I certify under penalty of perjury that the foregoing is true and correct.

Date: 6.5.18

/s/ Sabrina Lowe

Sabrina Lowe, debtor

NOTE:

1. This form must be filed with the court and served upon the Standing Chapter 13 Trustee and creditor at least seven (7) days before the return date pursuant to D.N.J. LBR 9013-1(d), if filed in opposition to a *Motion for Relief from the Automatic Stay or Trustee's Motion to Dismiss*.
2. This form must be filed with the court and served upon the Standing Chapter 13 Trustee and creditor within ten (10) days of the filing of a *Creditor's Certification of Default* (under an *Order Resolving Motion to Vacate Stay and/or Dismiss with Conditions*) or a *Trustee's Certification of Default*.

If this form is not filed the Motion or Certification of Default will be deemed uncontested and no hearing will be scheduled.